

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA

In Re:  
Winona Chan Dam  
Debtor

Chapter 13  
Bankruptcy No. 23-13868-AMC

TRUSTEE'S MOTION TO DISMISS PURSUANT TO 11 U.S.C. SECTION 1307

To the Honorable Judges of the United States Bankruptcy Court for the Eastern District of Pennsylvania:

1. Your Movant is Scott F. Waterman, Esq. the duly qualified and acting Chapter 13 Trustee in the above-captioned case.
2. The within case was commenced by the filing of a Chapter 13 petition on 12/22/2023.
3. This Motion to Dismiss has been filed for the following reason(s):
  - There has been unreasonable delay as defined by 11 U.S.C Section 1307(c)(1) by the above-captioned Debtor(s).

WHEREFORE, Scott F. Waterman, Esq., Standing Chapter 13 Trustee, requests that the Court, after a hearing, enter an Order dismissing this case.

Date: 07/24/2024

Respectfully submitted,

/s/ Ann Swartz, Esq.

Ann Swartz, Esq.  
for  
Scott F. Waterman, Esq.  
Standing Chapter 13 Trustee  
2901 St. Lawrence Avenue, Suite 100  
Reading, PA 19606  
Telephone: (610) 779-1313